

EIS Scoping Comment on Impacts of Vessel Traffic at the Proposed Gateway Pacific Terminal (GPT)

My name is Michael Crum. As my wife and I explored the beach at Cherry Point, a pod of Orcas appeared about two hundred yards off shore. We were privileged to watch them for more than thirty minutes. Being in that beautifully pristine environment, while watching Orcas moving slowly along the Georgia Strait, was both magical and memorable. I am saddened that the extraordinary beauty of Cherry Point and all future opportunities for moments like these could be destroyed forever!

The GPT Project Information Document, p.105, proposes a 1,625' long x 50' wide Trestle serving a 3,000' long x 105' wide Wharf, with three berths: Berth 1 – 1,137'; Berth 2 – 1,227' and; Berth 3 – 636'. The berths are designed to accommodate as many as two Capesize and one Panamax bulk-cargo carriers at the same time. Capesize vessels would be served by Berth 1 and by Berth 2 ... both located toward the northwestern portion of the wharf.

The Project Information Document reveals little information regarding nearby structures or facilities just beyond the GPT site boundaries. Yet, identifying the nature of those facilities is critically important for an accurate and comprehensive analysis of the scope of significant, probable adverse impacts of the proposed GPT.



By analyzing aerial photographs and illustrations of GPT's site-specific wharf and trestle plans and comparing those plans to geographic features of the proposed site location available via Bing Maps, aerial view, I was able to determine the proximity of the proposed GPT wharf to the current BP Refinery petroleum shipping and receiving docks. The image above shows the current BP Refinery docks with one oil tanker (shown at left-center) and the proposed location of the GPT wharf (shown at lower center). The proximate distance between the two docks is less than 3,000 feet. For a Capesize bulk-cargo vessel, a distance of 3,000 feet represents a mere three boat lengths!

With the BP Refinery dock and the proposed GPT wharf oriented essentially parallel to the shoreline, both would be subject to similar tidal currents and wind patterns. Oil tankers approaching BP's dock, from Rosario Strait, would pass by in close proximity to the proposed GPT wharf. And Capesize bulk-cargo vessels approaching or departing from the proposed GPT wharf, Berth 1 would maneuver *within three boat lengths* of the BP Refinery dock.

Under the 1999 Settlement Agreement, Pacific International Terminals agreed to conduct a Tidal Current Study (2.10e) and a Vessel Traffic Analysis (2.10a). Combined data from the Tidal Current Study

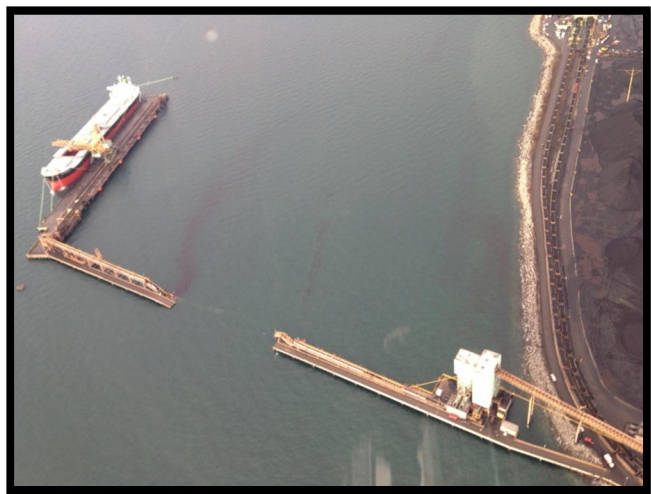
and from the Vessel Traffic Analysis is essential ... to identify operation protocols to reduce the risk of vessel collisions, groundings, spills and other operational incidents as well as to facilitate the wharf design and its final orientation.

The GPT, Project Information Document, Chapter 4.5.7 "Emergency Response for Vessel Traffic" states: "A site-specific emergency response plan would be developed ..." Chapter 4.5.7.2 "Marine Spill Response" states: "a plan ...will be developed." To be clear, **the GPT Project Information Document provides no plans for site-specific emergency response pertaining either to adverse impacts resulting from vessel traffic or for adverse impacts resulting from marine spills!** At this date, the applicant has failed to comply with related requirements of the 1999 Settlement Agreement and, incredulously, offers no such plans in the current GPT Project Information Document. How can this applicant repeatedly fail to comply with vital components of the application process ... and not be held accountable?

A 2008 BP Refinery [Vessel Traffic Risk Assessment](#) study projected dramatic increases for both the risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels, groundings (both powered and drift), and collisions (collisions with the dock or other fixed objects) if crude vessel traffic levels increased by 17% at the BP Cherry Point Refinery.

Cherry Point's shoreline currently receives 850 annual vessel transits from its three marine piers. At full capacity, GPT proposes 974 transits. Even without considering unmitigated impacts of wind and tidal currents, 1,824 oil-tanker and bulk-cargo carrier transits per year represents more than a **215% increase in vessel traffic levels** along the Cherry Point shoreline and poses potentially adverse (if not catastrophic) impacts on vessel traffic around BP Refinery's dock. Yet, the GPT Project Information Document includes no emergency response plans related to vessel traffic or to marine spills!

On December 7, 2012, the bulk-cargo carrier, *Cape Apricot*, crashed through the Westshore Terminal loading dock trestle causing 30 (or more) tons of coal to be spilled into the Strait of Georgia (see photo). This merely is a recent example of unmitigated adverse impacts from vessel mooring accidents and the vital need for safe vessel mooring standards and procedures. Under the 1999 Settlement Agreement, Pacific International Terminals agreed to a Vessel Mooring Study and Plan (2.11) ... to hire a marine engineering consultant to review existing safe vessel moorage standards, configurations and procedures of similar facilities and to develop a dock and terminal operations plan for the proposed facility for Ecology's review and approval. Has the applicant satisfied that 1999 Settlement Agreement obligation?



I ask that the following be included and be systematically analyzed within the scope of the EIS:

- ❖ Impacts of proceeding any further with Pacific International Terminals' application for the proposed GPT without the applicant's completion and full compliance with all requirements of the 1999 Settlement Agreement. Specifically, Tidal Current Study (2.10e), Vessel Traffic Analysis (2.10a), Vessel Mooring Study and Plan (2.11), Spill Prevention, Preparedness, and Response Plans (2.9a)
- ❖ Impacts of adding 974 annual transits of Capesize and Panamax bulk-cargo vessels, serving the proposed GPT wharf, to the current annual transits of oil-tanker vessels, serving BP Cherry Point Refinery, on health and safety of employees at both facilities.
- ❖ Impacts of 974 additional annual transits of Capesize and Panamax bulk-cargo vessels to the current annual transits of oil-tanker vessels, at BP Cherry Point Refinery, on risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels, groundings (both powered and drift), and collisions (collisions with the dock or other fixed objects).
- ❖ Impacts of 974 additional annual transits of Capesize and Panamax bulk-cargo vessels to the current 850 annual oil-tanker and bulk-cargo vessels, serving the Cherry Point shoreline, on risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels, groundings (both powered and drift), and collisions (collisions with the dock or other fixed objects).
- ❖ Impacts of 974 additional annual transits of Capesize and Panamax bulk-cargo vessels to the current number of commercial and private vessel transits, in the Rosario Strait, on risk of marine vessel accidents and oil spills or outflows resulting from collisions between two vessels and/or groundings (both powered and drift).